



June 8, 2003

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AWSP Team Office

Ms. Allison Ray
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, Washington 98104

Re: Comments of the Draft Environmental Impact Statement for the SR99
Alaskan Way Viaduct and Seawall Replacement Project

Dear Ms. Ray:

The Seattle Mariners have reviewed the Draft Environmental Impact Statement for the SR99 Alaskan Way Viaduct and Seawall Replacement Project and submit the following comments on behalf of the 3 million baseball fans that attend baseball games and other major events at Safeco Field each year.

Opportunity for Input

The Seattle Mariners appreciate the opportunity to comment on the Draft Environmental Impact Statement for the Alaskan Way Viaduct and Seawall Replacement Project. As a major event venue less than 500 feet from the proposed Royal Brougham ramps, and less than 1000 feet from the Atlantic Street ramps, we request a joint review of the proposed on/off ramp interchange prior to further design or development of that complex. We also request the opportunity to create an agreement between the project and the Mariners to memorialize the understanding of the operation of the road, the operation of the ballpark and the mitigation measures that will be taken to ensure the operational viability of Safeco Field during construction and after completion.

On-Off Ramp Complex

A major issue that needs to be addressed relates to the apparent lack of any alternative to the south end on/off ramp interchange that is proposed throughout all five project alternatives. The on-off ramp interchanges at Atlantic and Royal



Brougham represent the single most significant change in the SR99 roadway in the south end. Historically, Seattle has been opposed to creating a cross-town connection between SR99 and I5/I90 near downtown. While the connection that would be created is not a freeway, the net effect of having ramps at this location, when viewed in conjunction with the recently completed SR519 Atlantic Street ramp, could be to increase traffic and traffic speeds in what is already a very congested pedestrian environment on event days at Safeco Field. Pedestrian safety is an important issue for the Mariners.

We suggest consideration of an alternative on-off ramp interchange, or a split on-off ramp which would place half of the proposed complex further south. Massachusetts Street should be seriously considered.

Construction Phase Issues

Conditions during construction which may have adverse impacts on Safeco Field which were not adequately addressed in the DEIS include light/glare, noise, vibration, access, safety, congestion and dust.

Light/Glare: Depending upon the time of year that work is undertaken near the ballpark the type of lighting used and its placement at the worksite could result in some spillage and glare into the ballpark. This problem could be mitigated by maintaining direct contact with the Mariners and providing lighting previews whenever worksite lighting is moved to a new location or is redirected.

Noise: During a baseball game noise from the ballpark may or may not exceed noise levels from the project site. For non-baseball events noise from the worksite would probably exceed noise levels for the majority of non-baseball events at the ballpark. In the case of office-occupancy and retail areas along First Avenue noise from the worksite could be problematic. An overriding, monotonous noise of a pile driver could be disruptive to the concentration of players on the field. In the DEIS a suggestion was made that an oscillating system may be used as an alternative to traditional piledriving techniques. That technique was used next to Safeco field during the construction of the SR519 overpass, proved to be very acceptable to the Mariners, and should be considered for the SR99 project.

Vibration: Vibration caused by a pile driving technique would be of concern because of the cumulative effects on ballpark equipment and building integrity. Vibration could be a significant concern for the integrity of the ballpark retractable roof. This issue needs to be adequately studied prior to any work commencing and if it is proven that vibration would be felt in the ballpark adequate measures must be taken by the project to mitigate the problem.

Access: There are two areas of concern with access, pedestrian access and vehicular access. Safeco Field draws approximately 3 million visitors to baseball

games each year, plus additional visitors to other public and private events. A fullhouse game represents approximately 14,400 cars coming into the area. According to Washington State Ferries, 3,000 to 5,000 ferry riders come to each game. Metro to the Mariners provides bus service to approximately 1900 people per game, plus an equal number of riders on regular route service. Charter buses bring greatly varying numbers of fans, but on average approximately 1000 people arrive by charter bus. Sounder Commuter rail brings between 1,000 and 2,000 passengers on Sundays only.

When Safeco Field was developed several conditions were placed on the development. The ballpark was required to provide 3909 onsite or covenanted parking spaces. The City encourages fans to use parking inventory in the CBD and walk to the ballpark. Over 20,000 people walk from the CBD to each full house game, using all available north-south streets. Several of the north-south streets have very narrow sidewalks, consequently the loss of any sidewalk space could create a significant hazard to pedestrians, especially when taken in the context of the additional surface street traffic that is anticipated during construction. The DEIS did not address the issue of pedestrian access to the ballpark from Colman Dock, nor from the CBD.

With regard to vehicular traffic there is concern that the additional congestion anticipated to occur on First Avenue and Fourth Avenue will have a negative impact on the ballpark. This type of impact was previewed after the Nisqually earthquake when traffic backups doubled from the pre-earthquake norm. During construction the competition for road space will increase between fans going to baseball games and commuters going home. This was not discussed in the DEIS. In fact there was virtually no discussion of ballpark traffic issues. That is a major omission when the impacts will be felt no less than 81 times per year.

The second issue with vehicular traffic is the loss of parking in the area. A reduced parking inventory will drive up the price for parking both in the CBD and the miscellaneous parking lots south of Safeco Field. This will impact fans at the lower end of the economic spectrum that rely on low- or no-cost parking to bring their families to baseball games.

A thorough discussion of access needs to occur and agreements reached as to how increased traffic, loss of parking inventory, increased parking costs and additional transit costs will be mitigated, and how adequate and safe pedestrian access will be provided.

Dust: The DEIS identifies dust as a significant issue during construction. Ballpark equipment will potentially be affected by excessive dust. Enjoyment of the fans, even their willingness to attend games in an outdoor venue, could be adversely impacted by fugitive dust. There is no particular discussion of how dust will be controlled during the project. A specific discussion needs to occur between the Mariners and the project team regarding mitigation for the effects of

dust in the ballpark and potential impacts of dust on ballpark equipment and attendance.

Operational Phase Issues

Light/Glare: Post construction light and glare issues are similar to those identified during construction. The placement and intensity of lighting on the replacement structure needs to be reviewed in the context of the seating bowl at Safeco Field to ensure that light/glare do not adversely impact the ballpark.

Access: The comments in the DEIS regarding the proposed interchanges at Royal Brougham and at Atlantic all describe better access for fans going to baseball games. We question that assumption. The placement of an interchange at Royal Brougham and Atlantic will bring new traffic into close proximity of Safeco Field. At no time does the DEIS point out that access to the interchanges for the general traveling public will be significantly impeded by traffic going to or from baseball games. The description of the currently completed SR519 Phase I is inaccurate as it is on Atlantic Street, not on Royal Brougham as described. Baseball games will impact the proposed and existing interchanges no less than 81 times per year. Prior to making any final decision a thorough discussion needs to occur between the project team and the Mariners regarding how traffic will flow before and after ballpark events. Measures to mitigate new traffic impacts and any additional cost of traffic controls caused by the addition of ramps at these two locations will need to be identified and agreements reached regarding responsibility for additional ongoing costs during construction and after completion.

Safety: There is no discussion in the DEIS how the project intends to co-exist with the existing heavy pedestrian traffic going to events at Safeco Field once the SR99 interchanges are opened. For a significant period before and after games the sidewalks around and near the ballpark become congested with pedestrians. The current practice is to close Atlantic and Royal Brougham immediately after games to accommodate these conditions. There is no discussion in the DEIS how the project team envisions this practice continuing. There is no discussion in the DEIS to demonstrate a knowledge of the necessity for street closures and re-routes before, during and after baseball games and other major events at Safeco Field.

Between the opening of Safeco Field in July 1999, and end of the 2003 baseball season, **15,941,063 baseball fans have come to Safeco Field**. We ask that you step back and relook at the proposed ramp interchange in the context of the number of people who require safe and convenient access to Safeco Field. To this end, we urge consideration of Massachusetts Street as the location of the on/off ramp interchange in lieu of Royal Brougham.

Thank you again for this opportunity to comment on behalf of baseball fans. We look forward to future opportunities to work with the project team on impacts, alternatives and mitigation measures related to Safeco Field. Our contact for the Seattle Mariners is Susan Ranf, Director of Transportation, (206) 346-4236.

Sincerely,

A handwritten signature in black ink, appearing to read "Clyde H. MacIver". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

Clyde H. MacIver
Executive Vice President and
General Counsel

cc: Chuck Armstrong, President, Seattle Mariners
Washington Major League Baseball Stadium
State Public Facilities District
Steve Pierce, City of Seattle